

Steven M. Lester
Robert J. La Reddola

 **LA REDDOLA LESTER**
& ASSOCIATES, LLP
ATTORNEYS AT LAW
600 Old Country Road, Suite 230, Garden City, NY 11530
Tel: 516-357-0056 Fax: 516-357-0069
www.llalawfirm.com
sml@llalawfirm.com

April 5, 2023

BY ECF

Hon. Valerie Figueredo, U.S.M.J.
U.S. District Court, Southern District of New York
500 Pearl Street
New York, New York 10007

Application Granted



Valerie Figueredo, U.S.M.J.

DATED: April 6, 2023

The parties' request for a second extension is granted. The deadline to submit a proposed ESI protocol is extended to April 13, 2023. The Clerk of Court is directed to terminate the motion at ECF No. 48.

Re: Bayam Group, Inc. v. ID Tech LLC, Civil Action No. 22-8910 (VF)

Dear Judge Figueredo:

We represent Defendant in the above civil action. We submit this joint letter to request a second extension (*see* Doc. 46 for first joint request) of the Court's March 29, 2023 deadline to submit a proposed ESI protocol. (Doc. 43 at ¶ 10(b)). The Court granted the parties' first request for an extension to April 5, 2023 by endorsed order dated March 29, 2023. (Doc. 47).

The parties' counsel have been working cooperatively on this discovery matter. However, the timing of the preparation of the initial draft of the ESI protocol along with Defendant's counsel's travel schedule requires this request for a second extension to April 13, 2023.

If this request is acceptable, we respectfully ask that Your Honor "So Order" this letter for entry on the Court's docket.

The parties thank the Court for its consideration and are available to answer any questions the Court may have.

Respectfully submitted,



Steven M. Lester

cc: Counsel of record (by ECF)